

JOINT DECLARATION – EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

IN RE TYCO INTERNATIONAL LTD.,
SECURITIES LITIGATION

) MDL Docket No. 02-1335-PB
)
) This document relates to:
) Securities Action
) Civil Action No. 02-266-PB
)

STIPULATION WITHDRAWING OBJECTION

WHEREAS, Chris Andrews ("Andrews") filed an objection and a second amended objection to the settlement and the receipt of attorneys' fees by one of the Co-Lead Counsel firms in the above-captioned matter, copies of which are attached hereto as Exhibits A and B (collectively, the "Objection");

WHEREAS, as reflected in the Objection, Andrews initially provided consulting services authorized by Co-Lead Counsel in connection with the prosecution of this Action. These consulting services were provided regarding the alleged fraudulent accounting and business practices at ADT;

WHEREAS, Andrews received an initial payment of \$12,000.00 from Co-Lead Counsel for said consulting services he provided;

WHEREAS, a dispute arose between Andrews and Co-Lead Counsel over the value of further services provided and the extent to which such further services were authorized by Co-Co-Lead Counsel to be performed by Andrews;

WHEREAS, Andrews has now provided Co-Lead Counsel with an invoice for the additional consulting work he performed subsequent to his receiving the initial consulting fee, requesting payment from Co-Lead Counsel;

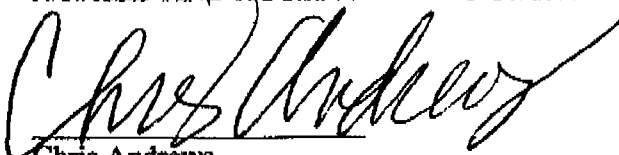
WHEREAS, Andrews and Co-Lead Counsel have resolved the dispute with

respect to the provision and value of the consulting services Andrews provided to Co-Lead Counsel and the Class to their mutual satisfaction;

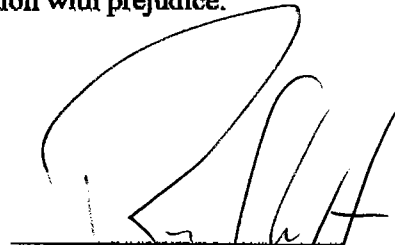
NOW THEREFORE, the parties to this stipulation hereby agree as follows:

1. In recognition of the consulting services provided by Andrews on behalf of the Class performed at the direction of Co-Lead Counsel, Plaintiffs' Counsel hereby agrees, subject to Court approval, to pay an additional \$25,000.00 to Andrews in consulting fees;
2. Said amount, upon approval of the Court, shall be applied for and paid out of the expenses that are ultimately awarded to Plaintiffs' Counsel by the Court and shall be due at the same time that Plaintiffs' Counsel is eligible to receive its award of expenses in the Settlement in connection with the above-captioned matter; and
3. Andrews hereby withdraws the Objection with prejudice.

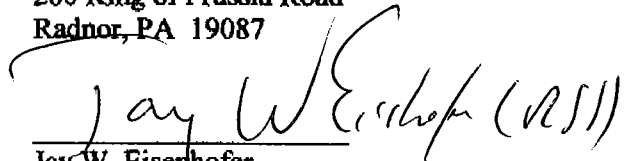
AGREED AND ACCEPTED AS OF 10/15/07:



Chris Andrews
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*Co-Lead Counsel for the Securities Action
Plaintiffs*

SO ORDERED: _____ DATE: OCTOBER __, 2007

PAUL BARBADORO
United States District Judge